



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 23, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Smart City Telecommunications, LLC
Study Area Code 210330**

Dear Ms. Dortch:

On behalf of Smart City Telecommunications, LLC ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company's outage reporting as required by Section 54.313.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313.



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Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Smart City Telecommunications, LLC
Study Area Code 210330
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Smart City Telecommunications, LLC (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must report outage information which is contained in an attachment to the 2017 ETC Annual Report.
3. The information contained in the attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.
4. With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

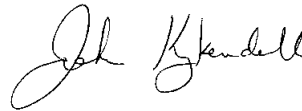
³ 47 C.F.R. §§ 54.313, 54.422.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachment is information that is not customarily released to the public. Outage information is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the outage attachment under seal. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁴ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁴ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Debbie Huttenhower
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	dhuttenhower@smartcitytelecom.com
	Form Type	54.313 and 54.422

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(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

<210> For the prior calendar year, were there any reportable voice service outages? Yes

[illegible]

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

<300> Unfulfilled service request (voice)	<div style="border: 1px solid black; width: 150px; height: 20px; margin: 0 auto;">0</div>
---	---

<310> Detail on attempts (voice)	<div style="border-bottom: 1px solid black; width: 100%;"></div>
	Name of Attached Document

<320> Unfulfilled service request (broadband)	<div style="border: 1px solid black; width: 200px; height: 20px; margin: 0 auto;">0</div>
---	---

<330> Detail on attempts (broadband)	<div style="border-bottom: 1px solid black; width: 100%;"></div>
	Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
210330f1510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	210330f1610.pdf

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**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	210330
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<015>	Study Area Name	SMART CITY TEL LLC
-------	-----------------	--------------------

<020>	Program Year	2018
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<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
-------	---	--------------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030> dhuttenhower@smartcitytelecom.com

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

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[illegible]

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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

[illegible]

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(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com
<810>	Reporting Carrier	Smart City Telecommunications, LLC
<811>	Holding Company	Smart City Finance, LLC
<812>	Operating Company	Smart City Telecommunications, LLC

[illegible]

FCC Form 481
OMB Control No. 3060-0986 / OMB Control No. 3060-0819
July 2013

<900>	Does the filing entity offer tribal land services? (Y/N)	No
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If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

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**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP www.smartcitytelecom.com/residential/residential-voice/

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

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(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.		
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.		
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.		
<2024A>	Round 2 Recipient of Incremental Support?		
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	
<2025A>	Round 2 Recipient of Incremental Support?		
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	210330f13010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	Yes - Attach New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	210330f13012.xlsm
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input checked="" type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.	<input checked="" type="checkbox"/>	
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	210330f13026.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

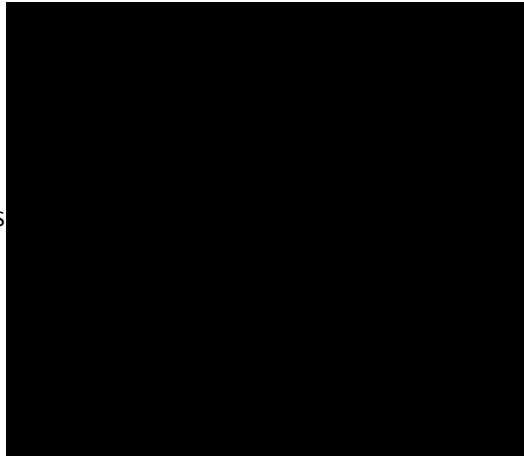
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



(4005) Rural Broadband Experiment Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

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Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	210330
<015> Study Area Name	SMART CITY TEL LLC
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035> Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	SMART CITY TEL LLC
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/22/2017
Printed name of Authorized Officer:	James Schumacher
Title or position of Authorized Officer:	VP Finance & Administration
Telephone number of Authorized Officer:	4078286656 ext.
Study Area Code of Reporting Carrier:	210330 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	SMART CITY TEL LLC
Name of Authorized Agent Firm:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/22/2017
Name of Authorized Agent Employee:	Lans Chase
Title or position of Authorized Agent or Employee of Agent	Staff Director - Regulatory
Telephone number of Authorized Agent or Employee of Agent:	7705692015 ext.1
Study Area Code of Reporting Carrier:	210330 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Data Collection Form

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FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<210> For the prior calendar year, were there any reportable voice service outages?

<220>

[illegible]

Smart City Telecommunications, LLC
Demonstration of Complying with Applicable Service Quality Standards and
Consumer Protection Rules for Voice and Broadband

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Smart City Telecommunications, LLC (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) Filing of Service Schedules pursuant to the requirements of Florida Administrative Code § 25-4.0341 and Florida Statutes, Title XXVII, Chapter 364 Telecommunications Companies, 364.04, which disclose rates to customers; (2) adherence to Florida state consumer protection requirements governing telephone providers for Compliance with Anti-Slamming Procedures as adopted in Florida Administrative Code § 25-4.118; and (3)

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

compliance with CPNI as identified in Florida Statutes Title XXVII, Chapter 364, 364.24, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order*.

Smart City Telecommunications, LLC
Demonstration of Ability to Function in Emergency Situations for Voice and
Broadband

Smart City Telecommunications, LLC (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Company’s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur. Further, Company has implemented and maintains a Disaster Recovery Plan.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

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**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

<701> Residential Local Service Charge Effective Date

1/1/2017

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	210330
<015>	Study Area Name	SMART CITY TEL LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Huttenhower
<035>	Contact Telephone Number - Number of person identified in data line <030>	4078286656 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dhuttenhower@smartcitytelecom.com

[illegible]

Smart City Telecommunications, LLC - SAC 210330

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Smart City Telecommunications, LLC - SAC 210330 hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

Community Anchor Institutions	
Name	Address
1 The Women's Center of Orlando, LLC	1148 Celebration Blv Celebration, FL 34747

REDACTED FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY